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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 PLANNED PARENTHOOD FEDERATION OF
14 AMERICA, INC.; PLANNED PARENTHOOD:
15 SHASTA-DIABLO, INC. dba PLANNED
16 PARENTHOOD NORTHERN CALIFORNIA;
17 PLANNED PARENTHOOD MAR MONTE, INC.;
18 PLANNED PARENTHOOD OF THE PACIFIC
19 SOUTHWEST; PLANNED PARENTHOOD LOS
20 ANGELES; PLANNED
21 PARENTHOOD/ORANGE AND SAN
22 BERNARDINO COUNTIES, INC.; PLANNED
23 PARENTHOOD OF SANTA BARBARA,
24 VENTURA AND SAN LUIS OBISPO
25 COUNTIES, INC.; PLANNED PARENTHOOD
26 PASADENA AND SAN GABRIEL VALLEY,
27 INC.; PLANNED PARENTHOOD OF THE
28 ROCKY MOUNTAINS; PLANNED
PARENTHOOD GULF COAST; AND PLANNED
PARENTHOOD CENTER FOR CHOICE;

Plaintiffs,

v.

CENTER FOR MEDICAL PROGRESS; BIOMAX
PROCUREMENT SERVICES, LLC; DAVID
DALEIDEN (aka "ROBERT SARKIS"); TROY
NEWMAN; ALBIN RHOMBERG; PHIL CRONIN;
SANDRA SUSAN MERRITT (aka "SUSAN
TENNEBAUM"); GERARDO ADRIAN LOPEZ; and
UNKNOWN CO-CONSPIRATORS, inclusive,

Defendants.

Case No. 3:16-cv-00236-WHO

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
PLAINTIFFS TO SUBMIT
MATERIALS *IN CAMERA***

Judge: Hon. Donna M. Ryu

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1 Dated: October 9, 2018

Respectfully submitted,

2 **ARNOLD & PORTER LLP**

3 By: /s/ Amy L. Bomse

4 Amy L. Bomse

5 Attorneys for Plaintiffs

6 Dated: October 9, 2018

FREEDOM OF CONSCIENCE DEFENSE FUND

7
8 By: /s/ Jeffrey M. Trissell

Jeffrey M. Trissell

9 Attorneys for Defendants

10 Gerardo Adrian Lopez, Center for Medical Progress &
BioMax Procurement Services, LLC

11 Dated: October 9, 2018

12 **LIFE LEGAL DEFENSE FOUNDATION**

13 By: /s/ Mike Millen

14 Mike Millen

15 Attorney for Defendant

16 Albin Rhomberg
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ATTESTATION

Pursuant to Local Rule 5-1, I, Amy L. Bomse, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s consent and have authorized the filing.

/s/ Amy L. Bomse
AMY L. BOMSE

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[PROPOSED] ORDER

IT IS HEREBY ORDERED that:

- 1. Plaintiffs may submit the documents attached to Docket 312, Exhibit C in unredacted form.

DATED:

The Hon. Donna M. Ryu
United States Magistrate Judge

1 **PROOF OF SERVICE**

2 I, Georgie M. Price, declare:

3 I am a resident of the State of California and over the age of eighteen years and not a party
4 to the within-entitled action; my business address is Three Embarcadero Center, Tenth Floor, San
5 Francisco, California 94111-4024. On October 9, 2018, I served the following document(s)
described as:

6 **JOINT STIPULATION AND [PROPOSED] ORDER FOR PLAINTIFFS TO
7 SUBMIT MATERIALS *IN CAMERA***

- 8 ☐ by placing the document(s) listed above in a sealed envelope with postage thereon
fully prepaid, in the United States mail at San Francisco, California addressed as
set forth on the attached **SERVICE LIST**.
- 9 ☐ by transmitting via email the document(s) listed above to the email address(es) set
forth below on this date before 5:00 p.m.
- 10 ☒ BY ELECTRONIC FILING/SERVICE; I caused such document(s) to be
11 Electronically Filed/and or Served using the ECF/CM System for filing and
transmittal of the above documents to all ECF/CM registrants.
- 12 ☐ by placing the document(s) listed above in a sealed Federal Express envelope and
13 affixing a pre-paid air bill, addressed as set forth on the attached **SERVICE**
LIST, and causing the envelope to be delivered to a Federal Express agent for
14 delivery.
- 15 ☐ by placing them in an envelope or package addressed to the persons at the
16 address(es) below and providing them to a professional messenger service for
personal service.

17 I am readily familiar with the firm's practice of collection and processing correspondence for
18 mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day
with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of
19 the party served, service is presumed invalid if postal cancellation date or postage meter date is
more than one day after date of deposit for mailing in affidavit.

20 I declare that I am employed in the office of a member of the bar of this court at whose
21 direction the service was made.

22 Dated: October 9, 2018

23 
24 Georgie M. Price
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